1 2 3 4 5 6 7	Eric Slocum Sparks Arizona State Bar No. 11726 LAW OFFICES OF ERIC SLOCUM SPARKS, P.C. 110 South Church Avenue #2270 Tucson, Arizona 85701-3031 Telephone (520) 623-8330 Facsimile (520) 623-9157 Attorney for Debtors
8	IN THE UNITED STATES BANKRUPTCY COURT
9	FOR THE DISTRICT OF ARIZONA
	In re:
10 11	BRIAN K. BISSELL AND No. 4:12-bk-00034-EWH No. 4:12-bk-00034-EWH
12	Debtors.) Chapter 11
13)) MOTION FOR VALUATION HEARING
14	
15	COMES NOW, Brian K. Bissell and Tracy L. Bissell, Debtors, Debtors in possession
16	("Debtors"), by and through counsel undersigned, pursuant to Bankruptcy Rule 3012 and 11 U.S.C.
17	§506(a) and hereby move this Court to set a hearing to determine valuation of the Debtors' real property
18	as shown at EXHIBIT A attached hereto, and the property in which various creditors claim an interest.
19	A valuation hearing is crucial in order for Debtors to determine the allowed amount of the creditors'
20	interest in the Debtors' interest in the property securing claims of creditors listed on EXHIBIT A .
21	Debtors seek a hearing to determine value due to the fact that the Debtors are nearing completion
22	for a Plan of Reorganization and Disclosure Statement and seek to treat a portion of some claims of the
23	listed creditors as fully secured and others partially or wholly unsecured.
24	A separate hearing on valuation is required in order for the Debtors to be able to determine the
25	amount of the creditors' interests in the Debtors' interest for purposes of the Plan of Reorganization.
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1	WHEREFORE, Debtors respectfully request that this Hongrable Court set this matter for hearing
2	and issue such orders pertaining to declarations and testimony/as the Court deems proper.
3	DATED February 6, 2012
4	LAW OFFICES OF
5	ERIC SLOCUM SPARKS, P.C.
6	/-/ Specific #11726
7	/s/ Sparks #11726 Eric Slocum Sparks
8	Attorney for Debtors
9	COPIES of the foregoing mailed/faxed/delivered February 6, 2012 to:
10	
11	UNITED STATES TRUSTEE 230 N. First Ave. #204 Phoening Arigana 85002
12	Phoenix, Arizona 85003
13	Robert J. Camp, Jr., Esq. PITE DUNCAN, LLP
14	4375 Jutland Drive, Suite 200 San Diego, CA 92177
15	Attorney/s for GMAC Mortgage, LLC
16	David Applegate, President & CEO GMAC Mortgage Corporate Headquarters
17	1100 Virginia Drive Fort Washington, PA 19034
18	Sanjiv Das, President & CEO
19	CitiMortgage, Inc. 100 Technology Drive MS 314
20	O'Fallon, MO 63368
21	
22	/s/ L. Anderson
23	78/ L. Anderson
24	
25	
26	
27	

EXHIBIT A

PROPERTY VALUATION A	N ANALYSIS:	Bissell, Brian & Tra	NALYSIS: Bissell, Brian & Tracy 4:12-bk-00034-EWH	<u>II</u>
Property Address	Mortgage Holder		Debtors' Opinion of Value	Creditor's Estimate of Debt
2330 N. Tanque Verde Place Tucson, AZ 85749	i. CitiMortgage, Inc. ii. GMAC Mortgage		\$250,000.00	\$463,900.00